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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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IN RE:	:	CASE NO.: 17-14735-RG
	:	
Lisa Cordi-Mocera	:	CHAPTER: 13
aka Lisa Mocera	:	
	:	HON. JUDGE.:
Debtor	:	Rosemary Gambardella
	:	
	:	HEARING DATE:
	:	

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**CERTIFICATION OF DEBTOR'S DEFAULT AND REQUEST FOR ENTRY OF AN  
ORDER VACATING THE AUTOMATIC STAY AND CO-DEBTOR STAY AS TO REAL  
PROPERTY TO SECURED CREDITOR**

I ~~Genevieve A. Jacobs~~ **Genevieve A. Jacobs** hereby certify as follows:

1. I am a **Bankruptcy Specialist** for Selene Finance LP as Servicer for NJCC Fund #5 Trust, a secured creditor of the Debtor.
2. After the Debtor's first default in payments, Secured Creditor filed a Motion for Relief from the Automatic Stay. Subsequently, Secured Creditor resolved the issues with the Debtor's attorney and an order was entered resolving the Motion for Relief from the Automatic Stay on December 23, 2020. The duly entered Order provided for, among other things, the Debtor was to file for a loan modification by November 13, 2020 or if denial of loan modification was received Debtor was to file a modified plan within fourteen days to pay arrears

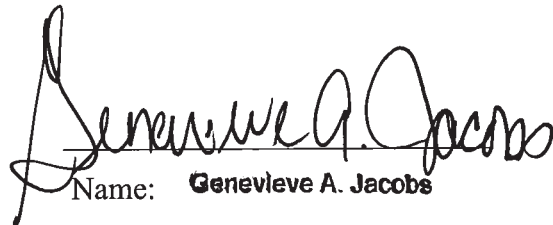
and Debtor was to resume making regular monthly payments in the amount of \$2,861.63 beginning November 1, 2020. The remaining terms of the order are set forth in the annexed **Exhibit A**, a true copy of the Order. The Court's attention is respectfully directed to the default clause of the order providing for the submission of the within certification and form of order upon default.

3. As of the execution of this certification, according to Secured Creditor's records, the debtor has failed to comply with the terms of the Order by failing to make the monthly adequate protection mortgage payments outside the Plan. The debtor is currently due for three monthly payments (November 2020-January 2021) in the amount of \$2,861.63 a month. The total amount past due is \$8,584.89.
4. Simultaneously with the submission to the Court of the within Certification and proposed form of Order, copies of these documents are being served upon the Debtor, Co-Debtor, counsel for the Debtor and the Standing Trustee.
5. Based on the above, the Debtor has failed to meet the conditions to continue the Automatic Stay, and it is respectfully requested that this Court enter an Order Vacating the Automatic Stay as to Real Property to the Secured Creditor.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

2/23/21



Name: **Genevieve A. Jacobs**

Title: **Bankruptcy Specialist**  
**Selene Finance LP**